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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 3:07-md-05944 SC
MDL No. 1917

This Document Relates to:

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd., et
al.*, No. 11-cv-05502;

*Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA.*, No. 13-cv-05261;

**DECLARATION OF HELEN C. ECKERT
IN SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

[RE DEFENDANTS' MIL NO. 7]

1 *Best Buy Co., et al. v. Hitachi, Ltd., et al.*, No.
2 11-cv-05513;

3 *Best Buy Co., et al. v. Technicolor SA, et*
4 *al.*, No. 13-cv-05264;

5 *Sears, Roebuck and Co. and Kmart Corp. v.*
6 *Chunghwa Picture Tubes, Ltd., et al.*, No. 11-
7 cv-05514;

8 *Sears, Roebuck & Co. and Kmart Corp. v.*
9 *Technicolor SA.*, No. 3:13-cv-05262;

10 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*
11 *et al.*, No. 11-cv-05514;

12 *Target Corp. v. Technicolor SA*, Case No. 13-
13 cv-05686;

14 *ViewSonic Corp. v. Chunghwa Picture*
15 *Tubes, Ltd., et al.*, No. 14-02510.

1 I, Helen C. Eckert, declare as follows:

2 1. I am an associate at the law firm of Sheppard Mullin Richter & Hampton LLP,
3 counsel of record for defendants Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.;
4 Samsung SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil
5 Ltda.; Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI").
6 I submit this declaration pursuant to Civil Local Rule 79-5(d) to establish that documents or
7 portions of documents containing "Confidential" and "Highly Confidential" information pursuant
8 to the Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306) and submitted to the
9 Court in connection with Defendants' Motion *In Limine* To Exclude Dr. Frankel's Inflation-
10 Adjusted Damages ("Defendants' MIL No. 7") are sealable. Except for those matters stated on
11 information and belief, about which I am informed and which I believe to be true, I have personal
12 knowledge of the matters set forth herein and could and would testify competently to each of
13 them.

14 2. The parties have disclosed or produced in this action certain documents and
15 information designated as either "Confidential" or "Highly Confidential" pursuant to the
16 Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306).

17 3. On February 13, 2015, SDI filed an Administrative Motion to Seal and lodged the
18 following documents pursuant to Civil Local Rules 7-11 and 79-5(d) and (e):

19 a. Exhibits 1-3 of the Declaration of James L. McGinnis in Support of
20 Defendants' MIL No. 7 (McGinnis Declaration).

21 4. Exhibit 1 to the McGinnis Declaration are excerpts of the April 15, 2014 Expert
22 Report of Alan S. Frankel for Plaintiffs Sears, Roebuck, and Kmart Corp. which reflects, contains
23 or refers to documents or information designated as "Confidential" or "Highly Confidential" by
24 Plaintiffs Sears, Roebuck and Kmart.

25 5. Exhibit 2 to the McGinnis Declaration are excerpts of the September 26, 2014
26 Rebuttal Reports of Alan S. Frankel for the following Plaintiffs: Best Buy Co. Inc., Best Buy
27 Purchasing LLC, Best Buy Enterprise Services L.P., Best Buy Stores L.P., Bestbuy.com LLC, and
28 Magnolia Hi-Fi LLC (collectively "Best Buy"); Alfred H. Siegel, as Trustee of the Circuit City

Stores, Inc. Liquidating Trust; CompuCom Systems, Inc.; Costco Wholesale Corp.; Electrograph Systems, Inc., Electrograph Technologies Corp. (collectively “Electrograph”); Interbond Corp. of America, d/b/a/ BrandsMart USA; Office Depot, Inc.; P.C. Richard & Son Long Island Corp.; MARTA Cooperative of America, Inc.; ABC Appliance, Inc.; Sears; Roebuck and Co.; Kmart Corp.; Target Corp.; Tech Data Corp., Tech Data Product Management, Inc. (collectively “Tech Data”); Schultze Agency Services, LLC, on behalf of Tweeter Opco LLC and Tweeter Newco LLC; and ViewSonic Corp. The excerpts reflect, contain or refer to documents or information designated as “Confidential” or “Highly Confidential” by those Plaintiffs.

6. Exhibit 3 to the McGinnis Declaration are excerpts of the July 10, 2014 Deposition of Alan S. Frankel which reflects, contains or refers to documents or information designated as “Confidential” or “Highly Confidential” by Plaintiffs Best Buy; Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust; CompuCom Systems, Inc.; Costco Wholesale Corp.; Electrograph; Interbond Corp. of America, d/b/a/ BrandsMart USA; Office Depot, Inc.; P.C. Richard & Son Long Island Corp.; MARTA Cooperative of America, Inc.; ABC Appliance, Inc.; Sears; Roebuck & Co.; Kmart Corp.; Target Corp.; Tech Data; Schultze Agency Services, LLC, on behalf of Tweeter Opco LLC and Tweeter Newco LLC; and ViewSonic Corp.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13th day of February 2015 in Los Angeles, California.

/s/ Helen C. Eckert
Helen C. Eckert